

REMARKS

The Examiner has rejected claims 1-3 and 9-17 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application Publication No. 2001/0018771 to Walker et al. in view of U.S. Patent Application Publication No. 2004/0054572 to Oldale et al. the Examiner has further rejected claims 6-8 under 35 U.S.C. 103(a) as being unpatentable over Walker et al. in view of Oldale et al., and further in view of U.S. Patent Application Publication No. 2002/0188949 to Wang et al.

The Walker et al. publication discloses a system and method for supplying supplemental information for video programs, in which, in response to a query from the user, the system provides supplemental information relevant to the query.

The Oldale et al. publication discloses collaborative filtering, in which Oldale et al. teaches a method for generating recommendations for a user.

The subject invention relates to the selective provision of complementary information to a video program being watched by a user. The system and method of the subject invention is characterized in that it anticipates the complementary information that the user may want and stores this anticipatory complementary information, and provides it to the user in response to a query request. In order to determine the anticipatory complementary information, the system and method of the subject invention receives all of the available complementary information and based on stored user profile data, culls the anticipatory complementary

information from the available complementary information and stores the anticipatory complementary information. To that end, the subject invention, as claimed in claim 1, includes "receiving complementary information for a video program" and "anticipating complementary information that might be requested by the consumer in response to said received complementary information and consumer profile data collected and stored in user data tables, and storing said anticipatory complementary information", and in response to a query "retrieving the stored anticipatory complementary information" and "providing the anticipatory complementary information as the query response".

Applicants submit that Oldale et al. teaches "To make recommendations to a user the knowledge of the user's profile is combined with the predictive model, taking the item profiles as known. This generates predictions for the user's choices of objects and/or ratings of objects. The method depends on what approach is being used." However, Applicants submit that this relates to generating recommendations for the user, and not to efficiencies of storage, or responses to a possible query by the user.

The subject invention, on the other hand, anticipates what complementary information a user, while watching a program, would desire. This anticipatory complementary information is culled from all of the available complementary information, and is locally stored, and subsequently supplied to the user in response to the user's query.

The Examiner acknowledges that Walker "fails to disclose the limitation wherein prior to receiving a query, the processor anticipates complementary information that might be requested by the consumer in response to said received complementary information and consumer profile data collected and stored in user data tables, and storing said anticipatory complementary information, and wherein, in response to the query, the processor retrieves the stored anticipatory complementary information and provides the retrieved anticipatory complementary information as the query response." The Examiner then states "Oldale discloses a system for generating a recommendation guide based upon user preferences [0195] where the recommendations are a product of filtering the data and then subsequently storing it [0145]. Therefore it would have been obvious to one of ordinary skill in the art at the time of the invention to include predictive searching technique in Walker's system to provide narrowed and more specific complementary information to the user based on the user profile."

Applicants submit that the Examiner is mistaken. There is only one "query" being asked in Oldale et al., to wit, "What program should I watch?"; but this query is not "related to a specified portion of the complementary information" for a video program. Rather, Oldale et al. is filtering descriptions of programs to arrive at recommendations for programs other than the video program being watched. Oldale et al. is not filtering complementary information for a video program, but rather Oldale et al. is filtering information for other video programs.

Applicants submit that it is unclear how this could be used in Walker et al., i.e., the filtering of descriptive information of other video programs in order to recommend a video program (or programs) for the user.

Applicants further submit that to add the filtering of Oldale et al. to Walker et al. to filter the complementary information in order to anticipate a query from the user, and to store the anticipatory complementary information, would constitute impermissible hindsight reconstruction of the invention as disclosed in the present claims.

Claim 6 includes the limitation "wherein the consumer profile data comprising data identifying video programs previously viewed by the consumer."

The Wang et al. publication discloses a method and apparatus for generating a list of suggested scheduled television programs, in which, in order to suggest programs, the user profiles include characteristics of television programs previously viewed by the user.

However, Applicants submit that Wang et al. does not supply that which is missing from Walker et al. and Oldale et al., i.e., "anticipating complementary information that might be requested by the consumer in response to said received complementary information and consumer profile data collected and stored in user data tables, and storing said anticipatory complementary information,

and wherein said step of providing a query response comprises the sub-steps of:

retrieving the stored anticipatory complementary information; and

providing the anticipatory complementary information as the query response".

In view of the above, Applicants believe that the subject invention, as claimed, is not rendered obvious by the prior art, either individually or collectively, and as such, is patentable thereover.

Applicants believes that this application, containing claims 1-3 and 6-17, is now in condition for allowance and such action is respectfully requested.

Respectfully submitted,

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